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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION
12

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 SANTOS RENE SOTO, and
17 SANTOS MOISES SOTO, III,

18 Defendants.
19

Case No. 22-CR-00378 WHO

STIPULATION AND ORDER TO
CONTINUE STATUS CONFERENCE AND
EXCLUDE TIME UNDER THE SPEEDY
TRIAL ACT

20 The United States, through undersigned counsel, and defendants Santos Rene Soto and Santos
21 Moises Soto III, through undersigned counsel, stipulate as follows:

22 This matter is set for a status conference November 20, 2025. The Court granted a continuance at
23 the last status conference for the government to assess the legal and logistical issues related to the
24 defendants' request to take depositions of nine witnesses residing in Barcelona, Spain, and to assess
25 whether the government can agree to use the MLAT process to obtain this defense witness testimony. In
26 addition, at the hearing the defendants raised other possible motions they may present prior to trial in
27 this case.

28 The parties request a brief continuance, and exclusion of time under the Speedy Trial Act, to

1 allow the government additional time to consider the defendants' request for depositions and to confer
2 with the defense on a schedule for any motions including the motion for Rule 15 depositions and other
3 defense motions. Based on the schedules of counsel for the parties, the parties jointly request the Status
4 Hearing be continued to January 15, 2026. The parties will file a joint status report one week prior to
5 the hearing with a proposed joint briefing and hearing schedule for any motions, or separate proposals if
6 the parties cannot agree on a schedule.

7 The parties agree that this continuance is necessary for effective preparation of counsel, taking
8 into account the exercise of due diligence, and for continuity of counsel given the availability of counsel
9 for the defense.

10 IT IS SO STIPULATED.

11 DATED: November 20, 2025

Respectfully submitted,

12
13 CRAIG H. MISSAKIAN
United States Attorney

14 /s/ _____
15 LLOYD FARNHAM
Assistant United States Attorney

16 /s/ _____
17 EDWIN PRATHER
Attorney for Defendant Santos Rene Soto

18 /s/ _____
19 DANIEL BLANK
20 Attorney for Defendant Santos Moises Soto III

21
22 **ORDER**


23 For the reasons stated above, the Court continues the Status Conference from November 20,
24 2025 to January 15, 2026 at 1:30 p.m. One week prior to the Status Conference, the parties shall file a
25 Joint Status Conference Statement regarding the status of any outstanding issues, and for any
26 contemplated pretrial motions a proposed schedule for the briefing and hearing of the motions.

27 The Court finds that: (i) the ends of justice served by the continuance outweigh the best interest
28 of the public and defendants in a speedy trial; (ii) failure to grant the continuance would be likely to

1 make a continuation of the proceeding impossible or result in a miscarriage of justice; and (iii) failure to
2 grant the continuance would deny defense and government counsel the reasonable time necessary for
3 effective preparation, taking into account the exercise of due diligence. The time from November 20,
4 2025 to January 15, 2026 is excluded in computing the time under the Speedy Trial Act, pursuant to 18
5 U.S.C. §§ 3161(h)(7)(A), (h)(7)(B)(i), and (B)(iv).

6 IT IS SO ORDERED.

7 DATED: November 20, 2025


8 HON. WILLIAM H. ORRICK
United States District Judge